

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

MISSOURI PRIMATE FOUNDATION,)
et al.,)
Plaintiffs and)
Counterclaim Defendants,)
v.)
PEOPLE FOR THE ETHICAL)
TREATMENT OF ANIMALS, INC., et al.,)
Defendants and)
Counterclaim Plaintiffs.)

Case No. 4:16-cv-02163

**COUNTERCLAIM PLAINTIFFS' MOTION FOR ATTORNEYS' FEES AND COSTS
INCURRED TO OBTAIN COMPLIANCE WITH THE CONSENT DECREE**

Pursuant to this Court's first Order of Civil Contempt [ECF No. 299], and Order regarding Counterclaim Defendant Tonia Haddix's ("Haddix") violation of the Consent Decree and Second Order of Civil Contempt [ECF No. 309], Counterclaim Plaintiffs People for the Ethical Treatment of Animals, Inc. and Angela Scott (together, "Plaintiffs") respectfully move this Court for an award of attorneys' fees and other costs incurred in litigating Haddix's contempt, to which the Court has already found Plaintiffs entitled, in the following amounts:

Attorneys' Fees: \$155,269.50

Costs: \$8,341.53

This motion is supported and more fully described by the accompanying memorandum and supporting documentation.

Dated: April 4, 2022

Respectfully submitted,

/s/ Jared Goodman
JARED GOODMAN (#1011876DC)

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Counterclaim Plaintiffs*

CERTIFICATE OF SERVICE

I certify that on April 4, 2022, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, by which notification of such filing was electronically sent and served to counsel of record, and was served by U.S. Mail to:

Tonia Haddix, lazyjet69@yahoo.com
12388 State Rd. CC
Festus, MO 63028
Appearing Pro Se

/s/ Jared Goodman